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Attorneys for Defendants UNITED AIR LINES, INC.  
and UAL CORP.

**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION**

Y. HATA & CO., LIMITED, on behalf of itself  
And all others similarly situated

Plaintiff,

v.

AIR FRANCE-KLM; BRITISH AIRWAYS,  
PLC; ASIANA AIRLINES CO., LTD.; JAPAN  
AIRLINES INTERNATIONAL CO., LTD.;  
CATHAY PACIFIC AIRWAYS LTD.;  
DEUTSCHE LUFTHANSA AG;  
SCANDINAVIAN AIRLINES SYTEMS;  
UNITED AIRLINES, INC.; UAL CORP.;  
CARGOLUX AIRLINES INTERNATIONAL  
SA; LAN AIRLINES SA; POLAR AIR  
CARGO, INC.; ATLAS AIR WORLDWIDE  
HOLDINGS, INC.; KOREAN AIRLINES CO.,  
LTD.; SINGAPORE AIRLINES, LTD.; ACE  
AVIATION HOLDINGS, INC.; AIR CANADA;  
AMERICAN AIRLINES, INC.; AMR  
CORPORATION; SINGAPORE AIRLINES  
CARGO PTE LTD.; and VIRGIN ATLANTIC  
AIRWAYS LTD.,

Defendants.

CASE NO. CV 06-01916-SC

**STIPULATION AND ~~[PROPOSED]~~  
ORDER TO EXTEND TIME TO  
RESPOND TO COMPLAINT**

The Honorable Samuel Conti

Pursuant to Local Rule 6-1(a), Defendants United Air Lines, Inc., and UAL Corp., respectfully request that this Court enter an order extending the time in which Defendants must answer, move or otherwise plead to this matter until the later of (1) the date when the Defendant would otherwise be required to file a response pursuant to Federal Rule of Civil Procedure 12, or (2) 45 days after a consolidated complaint is filed by Plaintiffs in the single transferee Court and served on Defendants. Plaintiff Y. Hata & Co., Limited has consented to the requested extension. In support of this motion, Defendants state:

1. The Complaint in this matter was filed on March 13, 2006. It seeks relief under the Sherman Act and the Clayton Act against 20 defendants on behalf of a putative class.
2. More than 80 similar actions have been filed in various jurisdictions around the country.
3. Plaintiffs in a number of related cases filed motions to consolidate and transfer before the Judicial Panel on Multidistrict Litigation ("JPML") under the matter captioned *In re Air Cargo Shipping Services Antitrust Litigation*, MDL No. 1775. On June 20, 2006, the JPML ordered all cases, including this case, to be transferred to the U.S. District Court for Eastern District of New York.

WHEREFORE, the Defendants request that this Court grant an extension of the Defendants' time to answer, move or otherwise plead in response to the complaint until the later of: (1) the date when the Defendant would otherwise be required to file a response pursuant to Federal Rule of Civil Procedure 12, or (2) 45 days after a consolidated complaint is filed by Plaintiffs in the single transferee Court and served on Defendants.

Dated: August 2, 2006

KERSHAW, CUTTER & RATINOFF LLP

/s/ C. Brooks Cutter  
C. Brooks Cutter (SBN 121407)

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*Attorney for Plaintiff Y. Hata & Co., Limited*

1  
2 Dated: August 2, 2006

MAYER, BROWN, ROWE & MAW, LLP

3 /s/ Shirish Gupta  
Shirish Gupta

4 *Attorneys for Defendants United Air Lines, Inc. and*  
5 *UAL Corp.*

6  
7 *Filer's Attestation: Pursuant to General Order No. 45, Section X(B), Shirish Gupta hereby attests*  
8 *that the signatories' concurrences in the filing of this document have been obtained.*

9  
10  
11 **IT IS SO ORDERED**

12  
13 DATED: August 4, 2006

